

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

R2 SOLUTIONS LLC,

Plaintiff,

v.

DATABRICKS, INC.,

Defendant.

Civil Action No. 4:23-cv-01147-ALM

JURY TRIAL DEMANDED

**DECLARATION OF VIGEN SALMASTLIAN
IN SUPPORT OF DATABRICKS, INC.'S MOTION FOR
SUMMARY JUDGMENT OF NON-INFRINGEMENT**

I, Vigen Salmastlian, declare as follows:

1. I am an attorney admitted to this Court, and I am a partner of the law firm of Fenwick and West LLP, counsel of record for Defendant Databricks, Inc. (“Databricks”) in this action. I make this declaration in support of Databricks, Inc.’s Motion for Summary Judgment of Non-Infringement.

2. Attached hereto as **Exhibit 1** is a true and correct copy of U.S. Patent No. 8,190,610.

3. Attached hereto as **Exhibit 2** is a true and correct excerpt of the document bearing Bates numbers Databricks_R2_00091426–Databricks_R2_00091494, which is a 2024 Databricks customer-facing slide deck.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the document bearing Bates numbers GMacartney_00000892–GMacartney_00000895, which is a Databricks webpage titled “What is Photon?”

5. Attached hereto as **Exhibit 4** is a true and correct excerpt of the Expert Report of William Davis Concerning Infringement of U.S. Patent No. 8,190,610.

6. Attached hereto as **Exhibit 5** is a true and correct excerpt of the Rebuttal Expert Report of Dr. Jon Weissman.

7. Attached hereto as **Exhibit 6** is a true and correct excerpt of the transcript of the March 25, 2025 deposition of Mr. William Davis.

8. Attached hereto as **Exhibit 7** is a true and correct excerpt of the transcript of the December 13, 2024 deposition of Mr. Cody Davis.

9. Attached hereto as **Exhibit 8** is a true and correct excerpt of the transcript of the January 16, 2025 deposition of Mr. Joshua Rosen.

10. Attached hereto as **Exhibit 9** is a true and correct excerpt of the transcript of the January 24, 2025 deposition of Mr. Reynold Xin.

11. Attached hereto as **Exhibit 10** is a true and correct excerpt of the transcript of the January 15, 2025 deposition of Mr. Vinod Nair Viswanath (Comcast).

12. Attached hereto as **Exhibit 11** is a true and correct excerpt of the transcript of the January 8, 2025 deposition of Mr. George Sirois (Abnormal Security).

I declare under penalty of perjury under the laws of the United States of America that, to the best of my belief, the foregoing is true and correct.

Executed on April 10, 2025.

/s/ Vigen Salmastlian
Vigen Salmastlian

CERTIFICATE OF AUTHORIZATION TO SEAL

Pursuant to Local Rule CV-5(a)(7)(B) that I am authorized to file the foregoing document under seal pursuant to Protective Order (Dkt. 61) because this document references Designated Material.

/s/ Vigen Salmastlian
Vigen Salmastlian

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 10, 2025, a true and correct copy of the above and foregoing document has been served on all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system. Additionally, I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of these documents via electronic mail per Local Rule CV-5.

/s/ Vigen Salmastlian
Vigen Salmastlian